

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALAN BROWN

Plaintiff

v.

STATE STREET CORPORATION

and STATE STREET GLOBAL

ADVISORS,

Defendants

C.A. No. 05-11178-NG

PLAINTIFF'S PRETRIAL DISCLOSURES PURSUANT TO RULE 26(3)

The plaintiff, Alan Brown, makes the following disclosures, pursuant to Fed. R. Civ. P., Rule 26(3).

The plaintiff expects to call the following witnesses:

1. Alan Brown
2. David Spina
3. Ronald Logue
4. Boon Ooi
5. Mitchell Shames
6. William Hunt
7. Luis deOcejo
8. Paul J. Duggan
9. Susan Britt
10. Mary Richards
11. Jennifer Bourgeois

12. Peter Leahy
13. Robert Weissman
14. Linda Hill
15. Nader Darshori
16. Richard Sergel
17. John Serhant
18. John Snow
19. John Marrs
20. Alan Nadel

The plaintiff expects to offer the following documents as exhibits at trial.

1. All exhibits listed by the defendant in its pretrial disclosure.
2. The plaintiff expects to offer the following exhibits. Exhibits marked with an asterisk may be offered.

Date	Document	Number
*3/2003	Compensation Committee minutes	
*3/18/2003	Compensation Committee minutes	SS00232
3/6/2004	Email AB to Harbert containing draft Spina email	AB 13
6/10/2004	Email Brown to Spina	AB 12
6/15/2004	Email Spina to Brown	AB 14, SS 01207
6/16/2004	Compensation Committee agenda	SS04668, 05555
6/29/2004	Email Spina to deOcejo	SS01206
6/30/2004	Letter Spina to Weissman	same as SS 01159 without stamp
6/30/2004	Email deOcejo to Ooi	SS 02130
7/12/2004	Email Ooi to deOcejo	SS05537-05545
7/12/2007	Letter deOcejo to Weissman	SS05477-05479

7/16/2004	Email Ooi to Weissman	SS05533-05534
7/28/2004	Email Ooi to Reisch	SS05531
8/17/2004	Email Harbert to Logue	SS01159
9/15/2004	Compensation Committee notes	SS04672-04674, 05474-05476, 05610-05613, 05702
*9/17/2004	Email Brown to Marrs	AB38, SS01210
10/1/2004	Email Brown to Logue	01157
*11/30/2004	Letter to US embassy	SS02061
1/20/2005	Email Marrs to Brown	SS02031
1/31/2005	Hunt announcement	SS02133
*2/3/2005	Email Michie to Marrs	SS01268
2/16/2005	Ooi email	SS02134
2/17/2005	Brown emails	SS02309
3/11/2005	Email Brown to Logue	SS02123
3/11/2005	Emails Brown/Shames	SS 01149, 02125, 02126, 02312
3/11/2005	Email Hunt to Marrs	SS01220
3/13/2005	Email Brown to Shames	SS02127
3/17/2005	Plan for Brown departure	SS01162 et seq
	Handwritten notes	AB54
1/12/2005	Handwritten notes	AB55
2/28/2005	Handwritten notes	AB48-49

3. The plaintiff reserves the right to amend this disclosure.

Alan Brown, plaintiff
By his attorneys,

/s/ Harvey A. Schwartz
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LORI A. JODOIN
BBO # 655840
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I certify that this document filed through the ECF system will be sent electronically to the registered parties as identified on the Notice of Electronic Filing and paper copies will be sent to all non-registered parties as of the date of filing with the ECF system.

/s/Harvey A. Schwartz
Harvey A. Schwartz